**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

GEORGE PAPPAS, individually and on behalf of all others similarly situated,	))	
	)	
Plaintiff,	)	
	)	
v.	)	Case No.
	)	
AUTO CLUB INSURANCE ASSOCIATION,	)	
	)	
Defendant.	)	

DECLARATION OF JESSICA LEGUE

Pursuant to 28 U.S.C. section 1746, Jessica Legue declares, under penalty of perjury, as follows:

1. I am a resident of the State of Michigan, and above the age of 18 years.

2. I am currently employed by The Auto Club Group ("ACG") as a Regional Claims Manager in Claims Reporting Operations. ACG is an insurance membership organization. Auto Club Insurance Association ("ACIA") is a reciprocal inter-insurance exchange, and is an affiliate of ACG.

3. As part of my job responsibilities, I retrieve claim data, including data relating to automobile claims, for use in business analysis purposes. I am authorized to execute this Declaration.

4. The facts set forth below are true and correct, based on my personal knowledge, and based on my review of business records made and kept in the regular course of business by persons whose regular job function is to make and keep such records. If called as a witness, I would truthfully testify to these facts.

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5. ACIA only underwrites automobile insurance in the following six (6) states: Illinois, Michigan, Minnesota, Nebraska, North Dakota and Wisconsin.

6. ACIA's first party automobile total loss claims are adjusted by adjusters employed in ACG's Total Loss Department. The first party automobile total loss claims are assigned to adjusters in the Total Loss Department through a website known as Footprints. ACIA's auto total loss claims are then adjusted using one of three Claims systems: FACTS; CPS; or IPM. A fourth Claims system called PISCES is a historical system that was only used in the states of Nebraska and North Dakota. PISCES is no longer being used, with the exception of less than 10 claims that are still being adjusted using that system.

8. I ran an audit on Footprints, and determined that the approximate number of ACIA first party automobile total loss claims reported through the Footprints system and paid during the time periods indicated below for the states of Illinois, Michigan, Minnesota, Nebraska, North Dakota and Wisconsin, are as follows:

> Illinois 1/7/2010 – 1/31/2020: 9,396 automobile total loss claims;
>
> Michigan 1/7/2014 – 1/31/2020: 1,584 automobile total loss claims;
>
> Minnesota 1/7/2014 – 1/31/2020: 1,414 automobile total loss claims;
>
> Nebraska 1/7/2015 – 1/31/2020: 83 automobile total loss claims
>
> North Dakota 1/7/2014 – 1/31/2020: 39 automobile total loss claims
>
> Wisconsin 1/7/2014 – 1/31/2020: 1,091 automobile total loss claims.

9. For the ACIA automobile total loss claims indicated in paragraph 8 above, ACIA's average payments were as follows:

> a. Illinois: $9,230.29;
>
> b. Michigan: $9,480.16;

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c. Minnesota: $7,198.89;

d. Wisconsin: $7,136.36.

ACIA's average payments for Nebraska and North Dakota are still being calculated.

10. Multiplying the average indicated in paragraph 9 above for first party automobile total losses paid by ACIA in Illinois, Michigan, Minnesota and Wisconsin, times the following sales tax percentages in each state, the potential exposure is up to $7,372,418.50 in alleged outstanding sales tax owed. The sales tax percentages used were: Illinois 6.25%; Michigan 6%; Minnesota 6.50%; Wisconsin 5%.

11. Plaintiff's Complaint alleges that the title, registration and license plate fees for the purchase of a vehicle is $251.00, and that ACIA underpaid these fees by approximately $131.00. These alleged amounts, multiplied by the ACIA automobile total loss claims indicated in paragraph 8 above, equal a potential exposure between $1,766,535.00 and $3,384,735.00.

I declare under penalty of perjury that the foregoing is true and correct, to the best of my knowledge and belief, based on my own knowledge and on the ACIA business records that I have reviewed in preparing this Declaration.

Executed this __10th__ day of February, 2020, in Dearborn, Michigan.

Jessica Legue
JESSICA LEGUE

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